

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                          )  
  )  
  )  
v.   )    No.: 16-cr-10305-NMG  
  )  
MARTIN GOTTESFELD                                    )

MOTION FOR LEAVE TO FILE POST-HEARING BRIEF

At a hearing yesterday, June 13, 2018, this Honorable Court granted undersigned counsel leave to file a supplemental brief concerning suppression. Counsel intends to file such a supplemental brief.

The defendant now moves for leave to file a brief addressing the additional topics of dismissal, the government's motion *in limine*, and bail, also heard at the June 13, 2018 hearing. In this brief, counsel will address issues raised during oral arguments at yesterday's hearing on these consequential topics. Given the importance of the issues at hand, and the overall posture of the case, Mr. Gottesfeld requests the Court ALLOW this motion for leave.

Respectfully submitted,  
MARTIN GOTTESFELD  
By his attorney:

/s/ David J. Grimaldi

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DATE: June 14, 2018

CERTIFICATE OF SERVICE

I, David J. Grimaldi, hereby certify that true copies of this filing were served on all registered participants in this matter via ECF this 14th day of June, 2018.

/s/ David J. Grimaldi

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David J. Grimaldi